

1 Harry P. "Hap" Weitzel (SBN 149934)

2 E-mail: weitzelh@pepperlaw.com

3 Jeffrey M. Goldman (SBN 233840)

4 E-mail: goldmanj@pepperlaw.com

5 PEPPER HAMILTON LLP

6 4 Park Plaza, Suite 1200

7 Irvine, California 92614

8 Telephone: 949.567.3500

9 Fax: 949.863.0151

10 Attorneys for Defendant

11 NEXTGEN HEALTHCARE INFORMATION
12 SYSTEMS, INC.

13 **UNITED STATES DISTRICT COURT**

14 **CENTRAL DISTRICT OF CALIFORNIA**

15 MEDSQUIRE, LLC,

16 Plaintiff,

17 v.

18 SPRING MEDICAL SYSTEMS,
19 INC.; QUEST DIAGNOSTICS,
20 INC.; NEXTGEN HEALTHCARE
21 INFORMATION SYSTEMS, INC.;
22 HENRY SCHEIN MEDICAL
23 SYSTEMS, INC.; HEWLETT-
24 PACKARD COMPANY; APRIMA
25 MEDICA SOFTWARE, INC.;
26 eCLINICALWORKS, LLC;
27 MED3000, INC.; PULSE
28 SYSTEMS, INC.; COMPULINK
BUSINESS SYSTEMS, INC.;
NEXTECH SYSTEMS, INC.;
NAVINET, INC.; successEHS,
INC.; athenaHEALTH, INC.,

Defendants.

Case No. CV11-4504 JHN (PLAx)

**STIPULATION TO EXTEND TIME
FOR DEFENDANT NEXTGEN
HEALTHCARE INFORMATION
SYSTEMS, INC. TO RESPOND TO
INITIAL COMPLAINT BY NOT
MORE THAN 30 DAYS (L.R. 8-3)**

Complaint served: May 27, 2011

Current response date: June 17, 2011

New response date: July 18, 2011

1 Pursuant to Local Rule 8-3, Plaintiff Medsquire, LLC ("Medsquire"), on the one
2 hand, and Defendant NextGen Healthcare Systems, Inc. ("NextGen"), on the other
3 hand, through their respective counsel, hereby stipulate and agree as follows:

4 WHEREAS, on May 25, 2011, Medsquire filed the Complaint in the instant
5 action in this Court;

6 WHEREAS, on May 27, 2011, Medsquire served NextGen with the
7 Complaint;

8 WHEREAS, prior to the deadline for NextGen to respond to the Complaint,
9 Plaintiff voluntarily dismissed defendant Nextech Systems, Inc.;

10 WHEREAS, the time for NextGen to respond to the Complaint currently is
11 June 17, 2011;

12 WHEREAS, Medsquire and NextGen have stipulated and agreed that
13 NextGen shall have a thirty day extension of time to respond to the Complaint;

14 WHEREAS, the agreed-to extension will result in NextGen's response to the
15 Complaint being due on or before July 18, 2011.

16 NOW, THEREFORE, the parties stipulate and agree as follows:

17 The response of Defendant NextGen Healthcare Information Systems, Inc. to
18 Plaintiff Medsquire, LLC's Complaint, including, but not limited to, an Answer or

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

1 Motion pursuant to Federal Rule of Civil Procedure 12, shall be filed and served on
2 or before July 18, 2011.

3
4 Dated: June 14, 2011

PEPPER HAMILTON LLP

5 By: /s/ Jeffrey M. Goldman
6 HARRY P. "HAP" WEITZEL
7 JEFFREY M. GOLDMAN
8 Attorneys for Defendant
9 NEXTGEN HEALTHCARE
10 SYSTEMS, INC.

11
12 Dated: June 14, 2011

HENNIGAN DORMAN LLP

13 By: /s/ Lawrence M. Hadley
14 RODERICK G. DORMAN
15 LAWRENCE M. HADLEY
16 Attorneys for Plaintiff
17 MEDSQUIRE, LLC
18
19
20
21
22
23
24
25
26
27